

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

v.

KINGSLEY R. CHIN,  
ADITYA HUMAD, and  
SPINEFRONTIER, INC.,

Defendants

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Criminal No. 21cr10256

GOVERNMENT'S MOTION TO SEAL INDICTMENT

Pursuant to Fed. R. Crim. P. 6(e)(4), the United States of America hereby moves this Court to direct that the indictment be sealed and that no person shall disclose the return of the indictment except when necessary for the issuance and execution of a warrant until such time that both defendants KINGSLEY R. CHIN and ADITYA HUMAD are in custody, at which point the indictment shall be unsealed automatically. As grounds for this motion, the government states that public disclosure of these materials at this point might jeopardize the government's ability to arrest the individual defendants. Once the non-corporation defendants are arrested, there is no need for the indictment to remain secret. The United States further moves, pursuant to General Order 06-05, that the United States Attorney, through undersigned counsel, be provided copies of all sealed documents that the United States has filed in this matter.

Respectfully submitted,

NATHANIEL R. MENDELL  
Acting United States Attorney

**ALLOWED David H. Hennessy U.S.M.J.**  
Aug 30, 2021

By: /s/ David G. Lazarus  
DAVID G. LAZARUS  
Assistant U.S. Attorney

Date: August 30, 2021